

EXHIBIT 6

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7
8 UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

9 SEMCON IP INC.,

10 Plaintiff,

11 v.

12 HUAWEI DEVISE USA, INC., et al,

13 Defendants.

Proceedings in the United States District
Court for the Eastern District of Texas,
Marshall Division

No. 2:16-cv-00437-JRG-RSP (LEAD
CASE)

14 **AMAZON'S OBJECTIONS TO
SUBPOENA**

REF #: SUB0102580

15 Pursuant to Rule 45 of the Federal Rules of Civil Procedure, Amazon.com, Inc.
16 ("Amazon") objects to the subpoena from Plaintiff SemCon IP Inc. ("Plaintiff") in the above-
17 referenced matter. To the extent that a meet and confer regarding any of these objections is
18 necessary, please contact undersigned counsel.

19 **I. GENERAL OBJECTIONS**

20 1. **Overbroad and Unduly Burdensome.** Amazon objects to the subpoena as
21 overbroad and unduly burdensome. *See* Fed. R. Civ. P. 26(b)(1). In particular, the subpoena
22 seeks "DOCUMENTS sufficient to identify *each* AMAZON PRODUCT sold in the United
23 States since 2010"—a period of over seven years. The subpoena defines "AMAZON
24 PRODUCTS" as "*all* Amazon Kindle tablets, including but not limited to Kindle, Kindle DX,
25 Kindle Fire, Kindle Fire HD, and Kindle Fire HDX *sold in or imported* into the United States
26 that include MEDIATEK PRODUCTS." The subpoena defines "MEDIATEK PRODUCTS" as
27 "*all* chips, chipsets, processors, or components thereof sourced or purchased from MediaTek that

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2017, I caused the foregoing document to be served by depositing the same in US Mail, First Class, Certified to the following:

Alessandra C. Messing
Brown Rudnick LLP
Seven Times Square
New York, NY 10036

DATED this 28th day of July, 2017.

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